

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

CARCL ROBOTHAM-GRANT,

Defendant.

INFORMATION

08 Cr.

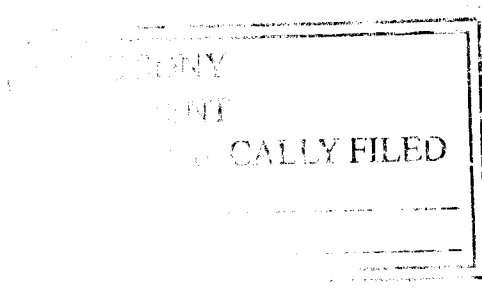
08 CRIM 655

COUNT ONE

The United States Attorney charges:

1. From at least in or about April 2007 up to and including in or about October 2007, in the Southern District of New York and elsewhere, CAROL ROBOTHAM-GRANT, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that CARCL ROBOTHAM-GRANT, the defendant, and others known and unknown, would and did distribute, and possess with the intent to distribute, a controlled substance, to wit, 1,000 kilograms and more of mixtures and substances containing a detectable amount of



marijuana, in violation of Sections 812, 841(a)(1), and 841(b)(1)(A) of Title 21, United States Code.

(Title 21, United States Code, Section 846.)

COUNT TWO

The United States Attorney further charges:

3. From at least in or about April 2007 up to and including in or about October 2007, in the Southern District of New York and elsewhere, CAROL ROBOTHAM-GRANT, the defendant, unlawfully, willfully, and knowingly possessed firearms in furtherance of a drug trafficking crime for which she may be prosecuted in a court of the United States, to wit, ROBOTHAM-GRANT possessed a firearm in furtherance of the drug trafficking crime charged in Count One of this Information.

(Title 18, United States Code, Sections 924(c) and 2.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense alleged in Count One of this Information, CAROL ROBOTHAM-GRANT, the defendant, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the said violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violation alleged in Count One of this Information, including but not limited to a sum of money equal to \$2,100 of United States currency,

representing the amount of proceeds obtained as a result of the offense alleged in Count One.

Substitute Asset Provision


5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendant --

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;
or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. §

853(p), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



MICHAEL J. GARCIA
United States Attorney

7/17/08
(S)

Waiver of Indi
Supersedes file

filed

MJ Hoffman